

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:16-CR-123
)	
Plaintiff,)	JUDGE SARA LIOI
)	
v.)	
)	
CHRISTOPHER FITZGERALD,)	<u>JOINT STIPULATIONS</u>
RASHARD SMITH,)	
CHIQUITA ANDERSON,)	
)	
Defendant.)	

It is hereby stipulated and agreed by and between the United States of America and defense counsel, with the express consent of the defendants, as follows:

1. Tax Returns for Christopher Fitzgerald and FitzDunn, LLC, for the year 2014 are authentic and admissible without the testimony of a Disclosure Agent from the Internal Revenue Service.

2. The bank account records for JP Morgan Chase account ending in x3270 for the years 2012, 2013, 2014, and 2015, held in the name of Christopher Fitzgerald are authentic, accurate, and admissible without the testimony of a bank custodian.

3. The bank account records for JP Morgan Chase account ending in x6190 for the years 2013, 2014, and 2015, held in the name of FitzDunn, LLC, are authentic, accurate, and admissible without the testimony of a bank custodian.

4. The bank account records for JP Morgan Chase account ending in x3150 for the years 2014, and 2015, held in the name of KC Management, LLC, are authentic, accurate, and admissible without the testimony of a bank custodian.

5. The following items seized from the apartment of Christopher Fitzgerald on April 9, 2015, located at George Zeiger Drive, Beachwood, Ohio, were maintained in the proper chain of custody and are admissible without the testimony of custodial witnesses:

- Kyocera Telephone, (216) 479-9181
- Kyocera Telephone, (216) 374-8293
- Backpack containing miscellaneous documents and discs
- Mossberg, .12 gauge shotgun
- .40 caliber Taurus handgun
- Evidence bags #0536504, #0536476, #0536474, #31556, #0511912 representing seized currency

6. The following items seized from a storage locker on April 9, 2015, located at 5333 Bedford Street, Bedford Heights, OH, #E2, were maintained in the proper chain of custody and are admissible without the testimony of custodial witnesses:

- Four (4) suitcases with the backs removed

7. The following items seized from the residence of Chiquita Anderson on April 9, 2015, located at Center Road, Bedford, Ohio, were maintained in the proper chain of custody and are admissible without the testimony of custodial witnesses:

- Scale found in kitchen
- Scale found on second floor

8. The following items seized from a residence and a vehicle located at Van Aken Blvd., Shaker Heights, Ohio on April 9, 2015, were maintained in the proper chain of custody and are admissible without the testimony of custodial witnesses:

- 5 cell phones belonging to Walter Walker

Defendant Christopher Fitzgerald

Date

Counsel for Defendant Fitzgerald

Date

Defendant Rashard Smith

Date

Counsel for Defendant Rashard Smith

Date

Defendant Chiquita Anderson

Date

Counsel for Defendant Anderson

Date

CAROLE S. RENDON
United States Attorney

By: _____
Assistant U.S. Attorney

Date